

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

Plaintiff(s) named below, for their Complaint against Defendants named below, incorporate the Master Complaint for Damages in MDL 2641 by reference (doc. 364). Plaintiff(s) further show the Court as follows:

1. Plaintiff/Deceased Party:  
Florence Edwards

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2. Spousal Plaintiff/Deceased Party's spouse or other party making loss of consortium claim:  
Cindy McKinzie, Jeff M Edwards, John Edwards, Sara Townley

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3. Other Plaintiff and capacity (i.e., administrator, executor, guardian, conservator):  
N/A Cindy McKinzie, administrator

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4. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence at the time of implant:  
Texas

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5. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence at the time of the injury:  
Texas

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6. Plaintiff's current state(s) [if more than one Plaintiff] of residence:

1 Texas

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2 7. District Court and Division in which venue would be proper absent direct  
3 filing:

4 Western District of Texas – Austin Division

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5 8. Defendants (check Defendants against whom Complaint is made):

6  C.R. Bard Inc.

7  Bard Peripheral Vascular, Inc.

8 9. Basis of Jurisdiction:

9  Diversity of Citizenship

10  Other: \_\_\_\_\_

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11 a. Other allegations of jurisdiction and venue not expressed in Master  
12 Complaint:

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13 16. 10. Defendants' Inferior Vena Cava Filter(s) about which Plaintiff(s) is making  
14 claim (Check applicable Inferior Vena Cava Filter(s)):

15  Recovery® Vena Cava Filter

16  G2® Vena Cava Filter

17  G2® Express (G2® X) Vena Cava Filter

18  Eclipse® Vena Cava Filter

19  Meridian® Vena Cava Filter

20  Denali® Vena Cava Filter

21  Other: \_\_\_\_\_

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22 11. Date of Implantation as to each product:

23 On or about April 12, 2005

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24 28. 12. Counts in the Master Complaint brought by Plaintiff(s):

1           X Count I:     Strict Products Liability – Manufacturing Defect

2           X Count II:    Strict Products Liability – Information Defect (Failure to

3                            Warn)

4           X Count III:    Strict Products Liability – Design Defect

5           X Count IV:    Negligence – Design

6           X Count V:     Negligence – Manufacture

7           X Count VI:    Negligence – Failure to Recall/Retrofit

8           X Count VII:   Negligence – Failure to Warn

9           X Count VIII:   Negligent Misrepresentation

10          X Count IX:    Negligence *Per Se*

11          X Count X:     Breach of Express Warranty

12          X Count XI:    Breach of Implied Warranty

13          X Count XII:   Fraudulent Misrepresentation

14          X Count XIII:   Fraudulent Concealment

15          X Count XIV:    Violation of Applicable Texas

16                            Law Prohibiting Consumer Fraud and Unfair and Deceptive Trade

17                            Practices

18          X Count XV:    Loss of Consortium

19          XCount XVI:    Wrongful Death

20          XCount XVII:   Survival

21          X Punitive Damages

22          □ Other(s):    All claims for relief set forth in the Master Complaint for

23                            an amount to be determined by the trier of fact.

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2 13. Jury Trial demanded for all issues so triable?

3 X Yes

4  No

5 ~~Respectfully submitted this 5th day of April, 2016~~

6 **Jeff M Edwards, Plaintiff**

7 ~~By: /s/ Jeff M Edwards~~

8 ~~Jeff M Edwards~~

9 ~~13785 Research Blvd~~

10 ~~Suite 125~~

11 ~~Austin, TX 78750~~

12 ~~Phone: (512)300-7555~~

13 ~~Email: JeffEdwards777@Gmail.com~~

14 *Plaintiff filing Pro Se*

15 **RESPECTFULLY SUBMITTED January 5, 2017.**

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17 By: /s/ Richard S. Lewis

18 Richard S. Lewis

19 Steve Rotman

20 Braden Beard

21 HAUSFELD LLP

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## **CERTIFICATE OF SERVICE**

I hereby certify that on January 5, 2017, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

*/s/ Richard S. Lewis*

Richard S. Lewis